

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : 17 Cr. 548 (PAC)

-v-

:

JOSHUA ADAM SCHULTE :

Defendant. :

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**DECLARATION OF SABRINA P. SHROFF IN SUPPORT OF DEFENDANT'S  
MOTION TO SUPPRESS EVIDENCE OBTAINED IN VIOLATION OF THE  
FOURTH AMENDMENT**

Sabrina P. Shroff declares under penalty of perjury:

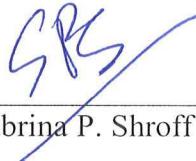
1. I am an attorney with Federal Defenders of New York, Inc., counsel for Defendant Joshua Adam Schulte. I make this declaration for the limited purpose of placing before the Court certain documents relating to Mr. Schulte's request for an evidentiary hearing pursuant to *Franks v. Delaware*, 438 U.S. 154 (1978).
2. Exhibit "A" is a true and correct copy of the March 13, 2017 search warrant and the search warrant application.
3. Exhibit "B" is a true and correct copy of the March 14, 2017 search warrant and the search warrant application.
4. Exhibit "C" is a true and correct copy of the remaining search warrants (through May 17, 2017), issued in this case.
5. Exhibit "D" is an excerpt of Joshua Schulte's Google search history from 2006 to March 2017 (JAS\_000024).
6. Exhibit "E" is an excerpt of Joshua Schulte's 2011 IRC Chats (JAS\_000028).

7. Exhibit "F" is a true and correct copy of the *Brady* Letter dated September 28, 2018.
8. Exhibit "G" is a true and correct copy of the non-classified Bill of Particulars dated April 29, 2019.<sup>1</sup>
9. Exhibit "H" is a true and correct copy of the Report of CP Image, including information pertaining to the file path.
10. Exhibit "I" is a true and correct copy of certain FBI 302's.<sup>2</sup>
11. Exhibit "J" is a true and correct copy of the Diagram of CIA network.<sup>3</sup>
12. Exhibit "K" is a classified addendum drafted by defense counsel.<sup>4</sup>

WHEREFORE, I respectfully request that the Court convene an evidentiary hearing pursuant to *Franks v. Delaware*, grant suppression, and direct such other relief as may be just and appropriate.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 3, 2019



Sabrina P. Shroff

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<sup>1</sup> See Classified Declaration of Sabrina Shroff.

<sup>2</sup> See Classified Declaration of Sabrina Shroff.

<sup>3</sup> See Classified Declaration of Sabrina Shroff.

<sup>4</sup> See Classified Declaration of Sabrina Shroff.